

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
CITIGROUP GLOBAL MARKETS INC.,

Plaintiff,

v.

ABDULLAH MAHMOUD ABBAR, GHAZI
ABDULLAH ABBAR, AJIAL
LEVERAGED FEEDER HOLDINGS
LIMITED, AMATRA LEVERAGED
FEEDER HOLDINGS LIMITED,
AMAVEST HOLDINGS LIMITED, and
GAMA INVESTMENT HOLDINGS
LIMITED,

Defendants.

USDC SDNY
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DATE FILED: 5-9-12

Case No. 11 Civ. 6993(LLS)

**STIPULATION AND [PROPOSED]
TRIAL SCHEDULING ORDER**

ECF CASE

RECEIVED IN CHAMBERS
OF LOUIS L. STANTON
MAY 08 2012
UNITED STATES DISTRICT JUDGE

STIPULATION AND [PROPOSED] TRIAL SCHEDULING ORDER

It is hereby ORDERED that:

1. Each party hereby waives any right to a jury trial it does have or may have had with respect to any claim or defense in this action.
2. The parties will exchange an initial set of proposed stipulated facts and each party's initial exhibit list on May 15, 2012.
3. The parties will exchange a revised set of proposed stipulated facts and each party's revised exhibit list on May 21, 2012.
4. The parties will meet and confer after May 21, 2012 in an attempt to stipulate to the set of proposed exhibits that will be offered at trial but will not be publicly accessible, pursuant to the terms of the Stipulation and Order Regarding Confidentiality, dated March 15, 2012 (the "Confidentiality Order"). In the event the parties cannot reach an agreement, the party seeking to have exhibits filed under seal will submit a letter to the Court, of no more than three (3) pages in length, explaining the basis of its position on or before May 31, 2012. Any

opposition, of no more than three (3) pages in length, shall be submitted within three (3) business days of receipt of any such letter.

5. Plaintiff will provide Defendants with a draft Joint Pretrial Order on May 31, 2012.

6. The parties will meet and confer after May 31, 2012, in an attempt to stipulate to facts not in dispute and exhibits that may be received in evidence. The parties will also meet and confer to determine the extent to which deposition testimony may be offered in lieu of live testimony for any witness who has appeared in the case.

7. The parties will file a Joint Pretrial Order on June 12, 2012. The Joint Pretrial Order will consist of sections containing: (a) agreed findings of fact, (b) Plaintiff's proposed findings of fact with evidentiary sources, (c) Defendants' proposed findings of fact with evidentiary sources, (d) a list of premarked exhibits that the parties agree may be received in evidence, (e) a list of premarked exhibits that the parties do not agree may be received in evidence, and (f) an estimate of the amount of trial time each party will require.

8. In the Court's discretion the Court may schedule a conference during the week of June 11, 2012, to determine whether any proposed exhibits referenced in Paragraph 4 shall not be publicly accessible, pursuant to the terms of the Confidentiality Order and applicable law.

9. The parties will serve and file with the Court trial briefs of no more than 50 pages on June 14, 2012.

10. The parties will exchange witness lists and designations of deposition testimony on June 15, 2012.

11. The parties will exchange counter-designations of deposition testimony on June 20, 2012.

12. All objections to deposition testimony are preserved for trial, to the extent such preservation is consistent with Rule 32(d)(3) of the Federal Rules of Civil Procedure.

13. In the Court's discretion the Court may schedule a Final Pretrial Conference during the week of June 18, 2012.

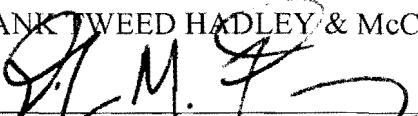
14. Trial will begin at 10:00 a.m. on June 25, 2012.

15. The terms of this Stipulation and Order may be amended or modified by the Court, on motion or *sua sponte*, or by the written agreement of the parties ordered by the Court.

Dated: New York, New York
May 4, 2012

CONSENTED TO:

MILBANK TWEED HADLEY & McCLOY LLP RICH, INTELISANO & KATZ, LLP

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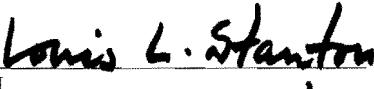
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Attorneys for Plaintiff Citigroup Global Markets Inc.

Attorneys for Defendants

SO ORDERED.


U.S.D.J.

5/8/12

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Attorneys for Defendants

SO ORDERED.

U.S.D.J.